

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

JENNIFER ELAINE LANIER,	)	
	)	
Plaintiff,	)	
	)	CIVIL ACTION FILE NO.
vs.	)	
	)	1:06-CV-0522-GET
DOUGLAS R. BESS, M.D.,	)	
GEORGIA DEPARTMENT OF	)	
CORRECTIONS, METRO STATE	)	
PRISON, MHM CORRECTIONAL	)	
SERVICES, INC. and GEORGIA	)	
CORRECTIONAL HEALTHCARE,	)	
	)	
Defendants.	)	

**DEFENDANTS MHM AND BESS'**  
**MOTION TO STRIKE THE TESTIMONY OF**  
**PLAINTIFF'S EXPERT MATTHEW W. NORMAN, M.D.**

COME NOW MHM CORRECTIONAL SERVICES, INC. and DOUGLAS R. BESS, M.D., named defendants in the above-captioned case, and pursuant to Fed.R.Evid. 702 and 402, hereby file their motion to strike the testimony of plaintiff's expert Matthew W. Norman, M.D. In support of this motion, defendants rely on the following:

- (1) Defendants' Brief in Support of their Motion to Strike;
- (2) Deposition transcript and exhibits of Matthew W. Norman, M.D. from the instant case;

(3) Deposition transcript of Dr. Norman from a prior case;

(4) Deposition transcript of Dr. Douglas Bess; and

(5) All of the pleadings and evidence filed in this case.

This 3<sup>rd</sup> day of August, 2006.

Respectfully submitted,

**CRUSER & MITCHELL, LLP**

s/Dean Simon-Johnson  
Deana Simon-Johnson  
Georgia Bar No. 646925  
Counsel for defendants MHM and  
Bess

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3500 Parkway Lane  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day electronically filed the **DEFENDANTS MHM AND BESS' MOTION TO STRIKE THE TESTIMONY OF PLAINTIFF'S EXPERT MATTHEW W. NOMRAN, M.D.** with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorney of record:

Adrienne P. Hobbs	Dave Stubins
Scott Halperin	Department of Law
Hobbs & Halperin	40 Capitol Square
235 Peachtree Street	Atlanta, GA 30334
#400	
Atlanta, GA 30303	

This 3<sup>rd</sup> day of August, 2006.

**CRUSER & MITCHELL, LLP**

s/Dean Simon-Johnson  
Deana Simon-Johnson